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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT  
8  
9 CENTRAL DISTRICT OF CALIFORNIA  
10

11 MARC WOLSTENHOLME,  
12 Plaintiff,  
13 vs.  
14 RIOT GAMES, INC.,  
15 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

*Hon. Fernando M. Olguin*

DECLARATION OF MARC  
WOLSTENHOLME OVERVIEW OF  
CHARACTER EVIDENCE

COMPARISON OF CHARACTERS FROM  
ARCANE & BLOODBORG. WITH  
REFERENCE TO POV'S FROM  
BLOODBORG AND PSYCHO-  
EMOTIONAL ANALYSIS.

VI VS ROOK, PLUS ELEMENTS  
BORROWED FROM OTHERS IN  
BLOODBORG.

JANUARY 15, 2025

23 Dated: January 15, 2025

*M. WOLSTENHOLME*

[MARC WOLSTENHOLME]

1 **I, Marc Wolstenholme, declare as follows:**

2  
3 **1. Background and Introduction**

4 I am the plaintiff in this case against Riot Games, Inc., regarding copyright  
5 infringement and unauthorized use of original materials derived from my manuscript  
6 "Bloodborg" and related works. I submit this declaration to provide evidence supporting my  
7 request for damages and to outline the profound and ongoing impact of the defendant's actions.  
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10 **2. Overview of Infringement**

11 In early 2020, I submitted my manuscript "Bloodborg" to Riot Forge, Riot Games'  
12 subsidiary, which was soliciting story-driven content for its gaming and multimedia initiatives.  
13

14 The manuscript contained unique narrative elements, character arcs, thematic  
15 developments, and psycho-emotional frameworks drawn directly from my personal trauma and  
16 medical records.

17 Subsequent to the submission, Riot Games' animated series Arcane began  
18 development and ultimately premiered on Netflix. Upon review of Arcane, it became evident  
19 that numerous narrative elements, character designs, plot structures, and aesthetic choices bore  
20 striking similarities to the contents of my manuscript.  
21

22 The case number for the M.W. Wolf copyright registration document is:

23 **1-14654214871**  
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1                   **3. Evidence of Direct Infringement**

2                   I have cataloged and submitted over 100 instances of direct infringements which  
3                   Arcane utilizes which accounts for a tiny fraction of the wider infringement:

4                   Unique character dynamics and origin stories.

5                   Themes and narrative frameworks mirroring those in "Bloodborg."

6                   Psychological and emotional states identical to those described in my manuscript.

7                   Many of these infringements not only mirror my work's aesthetic and narrative  
8                   but also align with proprietary trauma-based storytelling elements unique to my personal  
9                   experiences and writings.  
10

11                   In this document, I submit a Comparison of Characters from Arcane &  
12                   Bloodborg. With reference to POVs from Bloodborg and Psycho-Emotional Analysis. This  
13                   document is one of many comparisons. This document centers primarily on Vi Vs Rook, plus  
14                   elements borrowed from others in Bloodborg.  
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**4. Similarities to Defendant's Work:**

**Vi Vs Rook Overview Comparison.**

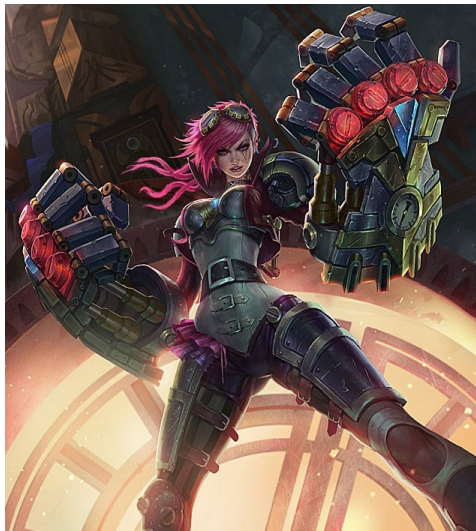
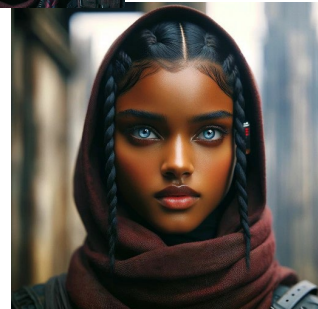
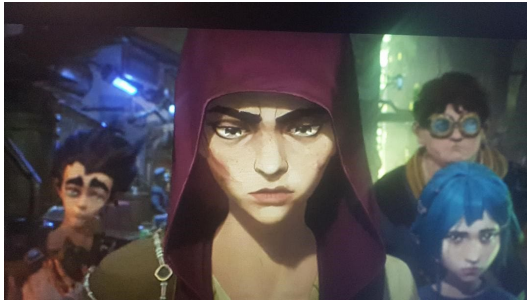
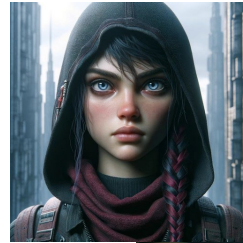
**4a. Visual References**

For visual reference, the character on the left is Vi from Arcane. The character on the right is two different Ai renditions of Rook from Bloodborg's detailed narratives. The character under them is Vi from The League of Legends game own by Riot Games.



**Vi and Rook**

Comparison of Characters



1 **4b. Backstory and Motivations**

2 **Rook:** Parkour Runner Rook is a survivor shaped by a harsh dystopian  
3 environment in New Kowloon. Her motivations stem from personal loss, loyalty to her found  
4 family and the younger gangway children, and a strong sense of justice. The traumatic death of  
5 her biological parents and found families (adoptive brothers Matteo and McCauley), along with  
6 her disguised identity as a boy by wrapping her chest with bandages and hiding under a veil and  
7 hood, highlights a life lived on the edge, navigating survival and rebellion and struggling with  
8 identity.  
9

10 **Arcane's Vi:** Parkour Runner Vi hails from the grim streets of Zaun, motivated  
11 by a desire to protect those she loves, particularly her sister, Powder (Jinx) and her adoptive  
12 brothers Mylo and Claggor. After losing her parents and facing the destruction of her family  
13 when Mylo and Claggor are killed, Vi channels her pain into fighting back against oppressive  
14 forces. Vi struggles with her identity, hiding under hoods and wrapping her chest with bandages.  
15  
16

17 **Similarity:** Both characters are defined by traumatic losses, which propel them  
18 into leadership roles. They carry guilt and a fierce determination to fight back against the  
19 systems that perpetuate suffering. Both lose their parents to murder, then they both lose their two  
20 adoptive brothers to the same. The two adoptive brothers of each share the same characteristics,  
21 body composition, personalities, personal skills and their death scenes are remarkably similar  
22 with both McCauley from Bloodborg and Mylo from Arcane being impaled by a pole. The long  
23 shabby hair of McCauley and Mylo differ only in colour.  
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Both characters are Parkour Runners, both have swollen left cheeks, and maroon veils and torn lips, both eat insects and bugs, both have practice fighting scenes to show skill development, both are indelible and resilient, both are in denial of what they must become.

#### **4c. Personality and Behaviours**

**Rook:** Intelligent, resourceful, and independent, Rook masks her emotions with practicality and determination. However, her softer side emerges in moments of introspection and when protecting her family or friends. Her dual identity reflects her vulnerability and adaptability.

**Arcane's Vi:** Vi is bold, brash, and headstrong. Her impulsive nature often gets her into trouble, but it also makes her fiercely loyal and protective of those she cares for. Vi's bravado hides a deep emotional sensitivity and unresolved guilt over her sister's transformation into Jinx.

**Similarity:** Both characters balance a tough exterior with hidden emotional depth, fiercely loyal to their makeshift families while grappling with internal conflicts.

#### **Appearance and Fighting Style**

**Rook:** Disguised with chest bandages, and under a maroon veil and hood, Rook hides her true identity. Her combat style relies on parkour-like agility, stealth, and improvisation. Her transformation into a skilled samurai fighter symbolizes her inner strength and growing self-acceptance.

1           **Arcane's Vi:** Vi's appearance changes as the story progresses. She is also hidden  
2 under a maroon veil and hood, hiding her true identity. Yet later in the storyline, she grows into  
3 herself —pink hair and muscular build—reflecting her bold personality. Her fighting style is raw  
4 and physical, she gains her agility through parkour. Yet relies on brute force amplified by her  
5 signature gauntlets. Unlike Rook's stealth, Vi's approach is direct and aggressive in her later  
6 iterations.  
7

8           **Similarity:** Both are exceptional fighters whose styles reflect their identities—  
9 Rook's agility symbolizes her resourcefulness, while Vi's strength represents her unyielding  
10 determination. Both have developed their fighting styles and skills through practicing with their  
11 orphan brothers after the death of their parents, to help them survive the harsh environments in  
12 which they live. Arcane Vi's transformation in season 2 suggests she has grown away from  
13 Rook's narrative to become something closer resembling Vi from the League of Legends Game.  
14 To make and to show this transformation, it is alleged that Bloodborg's Warwick's narratives are  
15 used in a deliberate IP infringement method known as "Pick N Mix."  
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19           **The difference:** Vi has short pink hair in season 1 of Arcane and black hair in  
20 season 2. Whilst Rook has her long glossy black hair hidden under veils and hoods to mask her  
21 identity. Rook is of Asian (Indian) heritage, as is the crying bridge statue in the opening scene of  
22 Arcane, symbolizing the loss of Vi's / Rook's parents.  
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#### 4d. Relationships and Dynamics

**Rook:** Her trauma and relationships define her story. From the death of her parents to her found family (Mateo and Macaulay) to her unique and complex bond with Roy the robot, Rook is fiercely protective of her loved ones. The betrayal and deaths of her family add layers of guilt and responsibility to her character arc.

**Arcane's Vi:** Vi's trauma and dynamic with her sister, Powder (Jinx), and her protectiveness over her found family (Mylo and Claggor), and the death of her parents, defines her story. Her growing partnership with Caitlyn shows her complexity in relationships. She struggles with the burden of protecting others while coping with guilt and betrayal.

**Similarity:** Both characters are shaped by their relationships, particularly the loss of their families, guilt and betrayal, and the weight of protecting those who remain. Their relationships often drive their actions and moral conflicts. Trauma is central to both dynamics.

#### 4e. Core Themes in Their Stories

**Rook:** Themes of identity, trauma, family, survival, rebellion, and loyalty are central to Rook's story. Her internal conflict between her concealed femininity and her warrior persona symbolizes the struggle to reconcile different parts of herself. The broader narrative explores the fight against oppressive systems and the cost of revolution, and the trauma war and conflict cause.



1           **Arcane's Vi:** Arcane centres around themes of trauma, family, loyalty, and  
2 redemption. Vi's story highlights the personal toll of systemic oppression and the emotional  
3 struggle of fighting against those she once loved.  
4

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6           **Similarity:** Both stories explore the cost of trauma and rebellion and survival in  
7 dystopian settings. Themes of identity and self-acceptance are particularly strong in Rook's  
8 narrative but resonate with Vi's journey as well. Vi has a longer character arc than Rook, as only  
9 the first book of Bloodborg is written. Yet the foundations of both characters, themes and arcs  
10 are remarkably similar, down to the hobbies, mannerisms, reputations, psychological and  
11 physiological scars and ticks of each.  
12

#### 13 14 **4f. Unique Differences**

15           **Rook's Internal Conflict:** Rook's dual identity as a disguised boy adds a layer of  
16 complexity to her character. This hiding under hoods and reluctance to embrace herself is shared  
17 with Vi's younger self in early (S1 E 1, 2 & 3) episodes of Arcane. Yet in later episodes, after Vi  
18 has been to prison and had to develop a more masculine persona to protect herself and perhaps  
19 through abuse, this dual identity is contrasting as Vi's bold personality is now openly expressed.  
20 Young Rook bandages her chest to hide her femininity which she sees as a vulnerability in a  
21 dangerous, gang-led dystopian existence. Divergent, older (Season 2 Act 2), and now tattooed,  
22 Vi has grown somewhat stronger and bolder with her persona. She now bandages her chest not to  
23 hide her femininity, but to express the masculine side of her persona. This subversion can be  
24 explained merely as a continuation of character development from a tween to a young adult.  
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1                   **Rook’s Connection with Technology:** Rook’s reliance on Roy and her mission  
2 involving the Neurocatcher in Bloodborg (Pink device in Arcane) intertwine technology with her  
3 personal journey of trauma and “Rags to Riches” story archetype. The submitted synopsis of  
4 Bloodborg: The Harvest states that “*Rook’s subplot is the beginning of Rags to Riches.*”  
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7                   **Arcane’s Vi:** Vi’s story, while technologically influenced by Hextech and her  
8 gauntlets from the League of Legend games, focuses more on her physical strength and  
9 emotional struggles and trauma. This is a deviation, and indeed complete indifference from her  
10 in-game character and backstory. Vi’s Arcane story archetype is also “Rags to Riches” yet she  
11 has branched beyond Rook’s personal development state and stage and in season 2 act 2, is  
12 alleged to have merged with Bloodborg’s Warwick’s self-destructive coping mechanisms. Those  
13 being Pit fights, isolation, alcohol abuse, existential nihilism and self-neglect. Alleged to have  
14 been written as introspective reflections in the trauma writing of the Plaintiff.  
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18 **4g. Vi Vs Rook overview comparison conclusion.**

19                   Rook and Vi share striking similarities in their trauma, resilience, loyalty, and  
20 fight against oppressive forces. They are both survivors navigating loss and betrayal while  
21 protecting their found families. Rook’s story adds layers of identity and technological intrigue  
22 that make her distinct, while Vi’s story begins in the same manner, it progresses to raw  
23 emotional intensity and directness and self-destructive coping mechanisms identical to  
24 Bloodborg’s Warwick’s coping strategies.  
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1           These two characters (Vi vs Rook) share the same narratives story beats, identical  
2 traumas, the same arcs, same distinguishing features, similar mannerisms, personalities,  
3 motivations, scars, family dynamics and even scenes. Both characters are deeply compelling  
4 heroes sharing the same personal journey of trauma and “Rags to Riches” story archetype.  
5

6  
7           The characters diverge later in the story of Arcane which spans many years over 2  
8 seasons. Yet even the season 2 act 2 character development of Vi is alleged to be taken from  
9 Warwick’s POV in Bloodborg.  
10

11  
12           In the latter half of season 2 of Arcane, when Vi’s story is alleged to deviate from  
13 M.W. Wolf’s narratives in Bloodborg, Vi is sidelined and does not experience any markable  
14 development and all that she has fought for, is all but marginalised. Vi’s arc is eclipsed by a  
15 lesbian sex scene during preparations for pending doom, seemingly to serve the adolescent erotic  
16 fantasies of the male dominated, and reportedly toxic community of League of Legends and the  
17 alleged “Bro-mancing” showrunners / “writers.” This is at a time in which Riot Games was  
18 under interventions for discrimination towards thousands of female employees after a class  
19 action lawsuit.  
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## 5. Vi's inception and development.

Vi's origins and development shares the same alleged patterns of "Swipe N Gripe" which the plaintiff alleges has been at the core of Riot Games since their 2009 launch.

### 5a, Misha, the Fists of Colossus

This image is a visual reference of Misha, the Fists of Colossus and Vi from the League of Legends Game



"Misha, the Fists of Colossus" is a fan-created champion concept for League of Legends, designed by artist FarahBoom and published on June 8, 2012. link

<https://www.deviantart.com/farahboom/art/Misha-the-Fists-of-Colossus-League-of-Legends-307052960>.

FarahBoom pitched this character to Riot but was unsuccessful in gaining a deal. Misha and her Colossus Fists are strikingly similar to Vi and her Atlas Gauntlets. While many fans have noted similarities between Misha and the official champion Vi, introduced in December 2012, there is no confirmed connection between the two characters. Many fans and

1 creators showed support for the young artist and some stated that they had contacted Riot about  
2 this alleged infringement.

3 One user stated, “let's just hope that riot credits this fine artist.” After Misha, the  
4 Fists of Colossus was shared online, Riot Games character concepts for Ruby in roller-skates  
5 were scrapped and became Vi, with the Atlas Gauntlets.  
6

7 Under the same link, A Fandom user- 18/12/2012 commented about the new Vi  
8 enforcer character and her relationship with Caitlyn, *“Is anyone else getting "vibes" between her  
9 and Caitlyn? I know their just meant to be partner's, but the pet name, the praising/taunting.  
10 This has probably been mentioned before, but... well...It add's diversity, is all I'm saying :P”*  
11

12 The “pet name” being referenced is Vi’s in-game Voice Line “Cupcake.” Which  
13 has been alleged to have been “Swiped” from The Game Borderlands. Borderlands 2 was  
14 officially released on September 18, 2012, again, just a few months before Vi was released. In  
15 the Borderlands game series, the word "Cupcake" is often used as a playful or mocking  
16 nickname, frequently delivered with a sarcastic or menacing tone. One of the most iconic  
17 instances is from Handsome Jack, the primary antagonist in Borderlands 2.  
18

19 The plaintiff makes this notation to show a pattern of much of the creation and  
20 developments of Vi and many of the other characters and “IPs” of Riot Games, beginning with  
21 fan art, fan theories and the works of other games, stories, writers, artists and shows. The  
22 Plaintiff alleges that fan theories, and his narratives of diversity were misused by Riot Games to  
23 misrepresent a change in culture at Riot whilst they were under State interventions, which has  
24 been double down upon, as evidence in the showrunners (Linke) aggressive denial of the gay  
25 relationship between Victor and Jayce.  
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**5b, Vi's differing developments over the years.**

This image is a visual reference of the map of Runeterra featuring the cities of Piltover and Zaun far apart and inland before the late 2019 update.



1 Vi, known as "The Piltover Enforcer," was introduced as a playable champion in  
2 League of Legends on December 19, 2012. Over the years, Vi's many inconsistent bios and mini  
3 stories have been expanded and refined, especially with the release of the animated series Arcane  
4 in November 2021, which delves deeper into her origins and relationships differing from her  
5 original character. The Arcane lore of Vi is now cannon to the LOL universe. Some stories have  
6 her origin location as Piltover, and others have her as a street child of Zaun. On the 2016 map of  
7 Runeterra, Piltover and Zaun were still far apart and both inland cities. A separate analysis of  
8 these cities will show how they too, have undergone significant developments and many changes  
9 to bring them aligned.  
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### 12 13 **5c. Vi's Concept and design**

14 Riot Games designer Josh Singh originally conceived the character as a girl  
15 named Ruby, who wears roller-skates. Singh's original concept was discarded after two years of  
16 development; she was renamed and redesigned by Paul Kwon, who gave her the code name  
17 "Piltover Enforcer". Kwon's colleague August Browning approved of his character work and  
18 decided to utilize the character as part of the team's ongoing work with introducing new playable  
19 Champions for League of Legends. Browning leaned on Kwon's illustration of Vi with oversized  
20 gloves, and as a result her gameplay mechanics are primarily based on the archetype of a punk  
21 girl with an aggressive personality. Paul Kwon's LinkedIn profile states that from March 2012 -  
22 March 2017 (5 years 1 month) he was a new Concept Artist at Riot Games, and he designed  
23 characters such as Vi during this period. Therefore, the new employee of Riot Games developed  
24 Vi who is alleged to essentially be Misha, the Fists of Colossus with pink hair, in the months  
25  
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1 after she was released on DeviantArt by a young female artist, recent art college graduate, and  
2 soon after Kwon joined Riot Games.

3           Graham McNeill was the writer responsible for coming up with Vi's backstory as  
4 an ex-criminal who assumes the role of a "bad cop" on behalf of the prosperous city of Piltover.  
5 Her original backstory depicted her as a hot-headed and impulsive individual with a loose respect  
6 for authority. Growing up alone, she developed sharp survival instincts and a wicked sense of  
7 humour. Eventually, she joined the Wardens of Piltover, wielding powerful Hextech gauntlets to  
8 maintain peace in the city. This is not the Vi of Arcane, who is alleged to have the same narrative  
9 story as Rook from Bloodborg. Countless retcons, and updates and changes have been made, yet  
10 some of Vi's stories are still available on:  
11

12 [https://universe.leagueoflegends.com/en\\_GB/story/champion/vi/](https://universe.leagueoflegends.com/en_GB/story/champion/vi/) and some of them still contain  
13 spelling errors and typos. None of them are consistent with Arcane but do contain Riot's self-  
14 reported, and alleged swipe method of "Treasured Gateways."  
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17           Riot Games's "Treasured Gateways." business practice will be explained in full in  
18 a separate report.  
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**5d. Narrative development history at Riot Games**

The Plaintiff proposes, before 2019- Riot Games has no in-depth nor consistent lore but knows it needs it and knows that its employees are not going to put their best foot forward. It is widely reported, and I quote, that Riot Games is a place where creatives go to “Fuck about and get paid”, to take a brake and work on their own material whilst Riot Games pays them well, at the expense of oppressive NDA’s and sexually harassing and toxic “Bro-mancing” working environments.

Because of this, Riot Games best chance is “Swipe n Gripe” and it knows so. Early on in its life, from 2009 onwards, Riot Games laid “Treasured Gateways.” These are one liner ambiguous sayings or overview stories with massive gaps, open to interpretation and adaptation, like “Glorious Evolution”, which will be explored in another document. Riot expands, dropping IP swipe traps as well as vague and malleable plausible deniability nuggets everywhere. It has over 169 characters, and features many animals and other creatures, each with many skins, styles and personas with thousands of one liners and inconsistent features, backstories and properties across a number of different worlds, games and stories, each laying tiny so called “Treasured Gateways” which they can use as nodes of theft, or IP swipe traps.

Riot normalises backdating, changing appearances, changing stories and even total retcons to hide its tactics of theft and backdating. Thus, when they must erase evidence of IP crimes, it doesn’t seem so suspicious. The fans communicate online, stitching together theories, narratives and backstories of their own. An example would be the fan theory that Jinx hates Vi because they are sisters, despite them being from different cities which are not yet fleshed out and started far apart on the map. Piltover and Zaun also have many different and

1 inconsistent stories of existence and positions on the map. On the fan wiki SmilianTheGrin  
2 14/03/2023 commend, *"Vi was raised in the lawless outskirts of Piltover" I'm not sure how much*  
3 *more clear it needs to be that it was from before Zaun was a thing."*  
4

5 Riot "Pick n Mix's what it likes, has a few employees send out a few teasers to  
6 pretend that it was always a plan, like "Ghostcrawler" Greg Street did for Vi and Jinx being  
7 sisters in a 2017 interview. Then when they find a place to mix in these Treasured Gateways,  
8 allegedly stolen, they force it into their evolving narrative, then retcon whatever no longer fits  
9 the narratives or characters, words or worlds.  
10

11 The Leagueoflegends.fandom.com/wiki, which is owned by Riot Games, states  
12 that "Before the release of Arcane, Vi and Jinx were often theorized by the community to be  
13 sisters. The reference to this on Jinx's release was her quote, *"You think I'm I'm crazy? You*  
14 *should see my sister". Though there was never any implication that the sister was Vi, Vi players*  
15 *equated Jinx's antagonization of Vi specifically as sisterly bonding... Incidentally, Jinx only*  
16 *antagonized Vi specifically on English-speaking servers. Other servers showed her antagonizing*  
17 *other champions... In an interview with Ghostcrawler, he mentioned that Jinx and Vi are*  
18 *"sisters", but later confirmed he was merely stating what he thought was true, and that the*  
19 *narrative team said otherwise."*  
20  
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## 22 **5e, Vi's Narratives and Stories**

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24 Before the release of Arcane, Vi's character in League of Legends was developed  
25 through various narratives and stories that provided insight into her background and personality.  
26 Some notable stories featuring Vi include.  
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1 *Vi's Original Biography*

2 “The Piltover Enforcer,” Introduced in December 2012, Vi's initial biography  
3 detailed her transformation from a Zaunite criminal to an enforcer in Piltover. This backstory  
4 highlighted her journey towards becoming a protector of Piltover.  
5

6 *Interrogation 101.*

7 A short story that showcases Vi's approach to law enforcement in Piltover. It  
8 provides a glimpse into her methods and interactions with other characters, emphasizing her  
9 tough and no-nonsense attitude.  
10

11 *Child of Zaun*

12 Released on December 10, 2019, this short story delves into Vi's return to her  
13 roots in Zaun as part of an investigation. It explores themes of law, order, and justice.

14 When inquiries were made into Vi's bio the Plaintiff was informed by Prestige  
15 Edition, long standing content creators of LOL material, most notably the audiobooks, “*This*  
16 *version was updated by Graham McNeill in 2019 (he wrote the original back in 2016). I imagine*  
17 *they'd probably update it again, but Riot hasn't given their Universe page much attention*  
18 *recently.*”  
19

20 These stories contributed to the development of Vi's character in the League of  
21 Legends universe prior to the expanded narrative presented in Arcane. However, they are  
22 incompatible and unrecognizable to the Vi in Arcane. Fans have noted this, some defending the  
23 contrasting stories by suggesting that Arcane is a different universe. However, Riot Games have  
24 now made Arcane the official canon lore, effectively overwriting Vi and her stories before  
25 Arcane.  
26

## 6. Key structural Overlaps

The Plaintiff alleges Rook's detailed narrative and point of view (POV) influenced and was used to build Vi's development from a more simplistic League of Legends character into her fully realized portrayal in Arcane.

Herein, The Plaintiff highlights key overlaps and structural similarities between Rook's POV and Vi's arc in Arcane. This will include character elements, worldbuilding, and themes to identify inspirations, crossovers and parallels.

### 6a. Character Development: From Cardboard to Fully Realized

**Vi in the Game** (League of Legends): In the game, Vi was a more straightforward character—defined as a brash, punch-first enforcer with little nuance. Her backstory was sparse, focusing on her rebellious nature and work with Caitlyn as an enforcer of Piltover. In one of her backstories, Vi took a pair of metal mining gauntlets and punched a hole in a wall to free miners. Much later, Hextech was added to the story, referring back to the Misha, the Fists of Colossus story of the gloves being made by Victor/ Jayce.

Soon after her December 2012 release, fan theories suggested that it would be good for diversity to make Vi and Caitlyn into love interests. Yet this was never planned nor promoted by Riot. Moreover, Fan theories suggested that Vi and Jinx (In the Games) have one liner digs at each other because they might be sisters. In 2017 Greg Street, a former developer at Riot Games, stated in an interview that they were sisters but then recanted.

1           **Vi in Arcane:** Arcane transformed Vi into a multi-layered character with deep  
2 emotional struggles, a tragic past, and complex relationships, particularly with her sister Jinx and  
3 love interest Caitlyn.  
4

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6           **6b. Parallels with Rook:**  
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8           Rook’s Depth vs. Vi’s Transformation: Rook’s POV demonstrates a similar  
9 journey from survival-focused pragmatism to deeply emotional and moral struggles. The  
10 transformation of Vi in Arcane parallels Rook’s emotional depth and multidimensionality—both  
11 are more than fighters; they are protectors burdened by loss.  
12

13           Loss and Family Motivation: Rook’s driving force is the protection of her found  
14 family, followed by the devastating loss of that family. Vi’s story in Arcane mirrors this, as she  
15 fights for Powder (Jinx) and later wrestles with guilt and sorrow when she loses her to the darker  
16 forces of Zaun.  
17

18           *Worldbuilding and Setting*

19           **Rook’s New Kowloon:** The dystopian, layered cityscape of New Kowloon is  
20 richly described. Its divisions between wealth, ruin, and squalor create a living, breathing  
21 environment. The oppressive Feral Fighters and the gangway children build a vivid picture of  
22 life at the margins, reinforcing themes of systemic oppression and rebellion. The “healthy” and  
23 able live high up on the platforms and gangways above the smog. The ill, diseased and mutated  
24 live deep down in the sunken and smog-filled underbelly of what was former Manhattan.  
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1                   **Arcane's Zaun and Piltover:** Zaun's industrial, polluted depths contrast with  
2 Piltover's gleaming progress, much like New Kowloon's Needle District against the "Tetris"  
3 District which both sit above the diseased and desolate and the under lanes. The stark disparities  
4 between rich and poor, along with the systemic exploitation of marginalized people, draw  
5 parallels with Rook's world.  
6

7                   **Both under threat of gangs and gang leaders:** In New Kowloon, Rook is living  
8 with, and fighting against, the threat of Cowboy Momahan and his Feral Fighters. Cowboy  
9 Momahan has vowed to unite the gangs for war and to become the first king of New Kowloon.  
10 In Arcane, Vi is living with, and fighting against, the threat of Silco and his gang of Goons. Silco  
11 has vowed to unite the gangs for war and to become the first king of Zaun, the polluted  
12 underbelly of Piltover, which started nowhere near Piltover on the map, until after Bloodborg  
13 was written and circulated. Both Cowboy Momahan and Silco are narcissistic violent and cruel  
14 scrawny gang leaders working with topside to achieve their aims of power and control of the  
15 underbelly.  
16  
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18                   **Other alleged Influences:** It is alleged that, the layered verticality of New  
19 Kowloon's geography and its socioeconomic divide inspired Arcane's approach to Zaun and  
20 Piltover, which emphasizes similar contrasts between the oppressed undercity and the privileged  
21 upper echelons.  
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1                   **6c. Themes of Identity and Rebellion**

2                   **Rook:** Disguising herself as a boy to navigate a world of danger adds layers of  
3 complexity to Rook's identity. She wrestles with her yearning for femininity while maintaining a  
4 masculine, hardened persona that ensures survival. Her rebellion against oppressive systems is  
5 deeply personal, driven by the loss of her family and friends.  
6

7                   **Vi:** While Vi doesn't disguise her gender, she struggles with it and attempts to  
8 mask it in the same manner of wrapping her breasts in bandages. Just like Rook, Vi understands  
9 that in harsh and lawless environments femininity is taken advantage of, thus she expresses her  
10 masculine persona. Her identity as a protector and her struggles with guilt and anger form the  
11 core of her character. Her rebellion against Piltover's systemic injustices is rooted in her loyalty  
12 to her family and her desire for redemption. This is the same as Rook's motivations.  
13  
14

15                   **6d. Thematic Overlap:**

16                   Both characters navigate personal identity in oppressive systems. Rook's struggle  
17 with survival and rebellion mirrors Vi's internal conflict between her enforcer role and her  
18 origins in Zaun. Both are dealing with trauma, one and the same.  
19  
20

21                   **6e. Relationships and Emotional Stakes**

22                   Rook's emotional stakes are heightened by her bonds with Mateo and Macaulay,  
23 as well as her mentorship role for the gangway children. The betrayal and death of her brothers  
24 devastate her, propelling her deeper into the fight. Roy, her robotic friend, adds a layer of unique  
25 emotional support, creating a bond between machine and human that echoes found family  
26  
27

dynamics. This bond deepens in books 2 and 3, not yet written but foreshadowed and hinted at in book 1.

Vi's relationships define her journey. Her protective role toward her brothers and Powder (Jinx) and her guilt over the brothers' deaths and Jinx's estrangement drive much of Arcane's emotional core. Her partnership with Caitlyn also echoes Rook's relationship with Roy—a dynamic of mutual trust and support that evolves over time.

**Key Parallel:** The deeply emotional stakes in Rook's and Vi's stories are strikingly similar, centring on loyalty, trauma, loss, and rebuilding trust.

## 6f. Fighting Style and Visual Imagery

**Rook:** Agile and acrobatic, Rook fights with stealth and precision. Her reliance on her environment, parkour, and ingenuity creates visually dynamic action scenes.

**Vi in Arcane:** Vi's fights are visceral and personal. While she relies on brute strength more than agility, the choreography of her fight scenes shares a sense of raw energy and determination that echoes Rook's approach. It's alleged that the detailed, fluid descriptions of Rook's parkour-style movements in combat inspired Arcane's emphasis on dynamic, emotionally charged fight sequences, particularly Vi's brawls, rolls and parkour-style movements. This fighting dynamic and heightened fight IQ is contrary to the standard LOL cinematics which the alleged "Bro-mancers" have been noted as obsessively calling "Fight Porn"

It is alleged that Arcane Vi's fighting style and sequences are a mix of her in game style of smash (Fight Porn) and more informed and intellectual style of Rook from Bloodborg.



## 6g. Symbolism and Emotional Arcs

**Rook's Chess Piece:** The white rook chess piece symbolizes her lost family and her journey of self-discovery. It grounds her in her humanity while pushing her toward her destiny. Towards the end of her story arc in book 1, Rook is symbolically given a samurai sword to mark what she will become. She is unofficially told that she will become "Queen of the rebuild", which we see in Arcane's Caitlyn in season 2. The character who tells Rook this is a spiritual guardian named B. In Bloodborg, B is a disguised ancient cyborg sorcerer, she teleported Warwick away as he was about to die. Which is an almost identical plot beat used for Jayce in the opening of Arcane season 1 episode 2. B shows up mysteriously in times of crisis or near death. B gave this samurai sword to Rook to symbolically "Pass on the torch" to tell her that she is ready.

**Vi's Gauntlets:** Vi's gauntlets represent her strength and role as a protector. They are both a weapon and a burden, tying her to her past and her fight for redemption. Whilst this has been an aspect of Vi from her creation and indeed, leads back to Misha, the Fists of Colossus, which is the character Vi is alleged to have been stolen from, it is not the same in Arcane. In Arcane, the gauntlets are a symbol of the death of Vi's parents on the bridge, the same symbolic function as Rook's chess piece, and this was not and has never been an aspect of Vi's character before Arcane. Vi is symbolically passed down the gauntlets via her adoptive guardian Vander- who is alleged to be Warwick in Bloodborg- to symbolically "Pass on the torch" to tell her that she is ready.

Both characters carry symbolic objects that define their arcs, connecting them to their past and their purpose. Both characters are connected to, and reminded of, the death of their

1 parents via the objects and both have weapons passed down to them to symbolically “Pass on the  
2 torch” to tell them that they are ready to fight back against oppression and perceived evil or  
3 crimes.  
4

#### 5 **6h. Supporting Evidence**

6 An abundance of circumstantial evidence cannot be ignored nor explained away.  
7 It is alleged that Rook’s POV directly inspired Vi’s Arcane character, the structural and thematic  
8 similarities are notable:

9 *Character Transformation:* Both Rook and Vi evolve from fighters into deeply  
10 layered characters with rich emotional arcs.  
11

12 *Worldbuilding:* The vertical, dystopian geography and socioeconomic struggles in  
13 Rook’s New Kowloon share significant overlap with Zaun and Piltover.

14 *Themes and Relationships:* Both characters navigate personal identity, familial  
15 loyalty, and rebellion against systemic oppression.  
16

17 *Visual and Narrative Style:* Rook’s dynamic, parkour-heavy action sequences  
18 parallel Vi’s choreography in Arcane. The symbolic use of objects (e.g., the chess piece, sword,  
19 the gauntlets) reinforces their journeys.  
20

#### 21 **6i. Conclusion of Key structural Overlaps**

22 The Plaintiff alleges that it’s impossible that so many key structural overlaps  
23 could take place in characters from two bodies of work, directly preceding submission of  
24 Bloodborg to Riot Forge and other literary agents, without IP being directly and purposely  
25 infringed upon. The Plaintiff alleges that many elements of Rook’s POV were used as inspiration  
26  
27  
28

1 to flesh out Vi in Arcane. The nuanced emotional stakes, rich worldbuilding, and layered themes  
2 in Rook's narrative align with how Arcane brought depth and humanity to Vi's character. The  
3 parallels are compelling and suggest that Rook's POV contributed to shaping Vi's transformation  
4 from a game archetype cardboard character into the fully realized hero of Arcane.  
5

6 Moreover, The Plaintiff alleges that he has identified a history and propensity of  
7 Riot Games and its "Treasured Gateways." business practice, to build plausible deniability post  
8 theft into their business plans and products. Additionally, The Plaintiff argues that he can  
9 evidence a long history of "Swipe N Gripe" and "Pix N Mix" of the IP and work of fans, fan  
10 theories, fan art and from other disadvantaged and vulnerable competitors who do not have the  
11 means nor ability to fight back. The Plaintiff argues that this equates to bullying and violation of  
12 anti-competitive laws, also referred to as antitrust laws in some jurisdictions.  
13

14 In doing so, Riot Games misused Plaintiff's submission under false pretenses and  
15 delayed the Plaintiff's ability to bring competing content to market, which constitutes unfair  
16 competition under California's Unfair Competition Law (Cal. Bus. & Prof. Code § 17200).  
17 Federal courts can hear state law claims under 28 U.S.C. § 1367 if they arise from the same facts  
18 as the copyright claims. Case management hearings are required to separate or consolidate the  
19 four cases as both District and Federal courts cases are now open.  
20

21 Please note, this is a macro-overview and does not represent Plaintiff's full and  
22 finished comparison of Vi vs Rook. Micro story elements, character cross overs and actual  
23 writing vs onscreen interpretations will follow.  
24  
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## 7. Legal Frameworks

This section provides the legal basis for the claims asserted by the Plaintiff under federal and state law.

### CASE 1. Copyright Infringement (17 U.S.C. § 501)

The Copyright Act of 1976 provides the framework for protecting original works of authorship, including literary works, against unauthorized use. Under 17 U.S.C. § 501, any violation of the exclusive rights of a copyright owner constitutes infringement. These exclusive rights include reproduction, distribution, public performance, public display, and preparation of derivative works.

#### *Legal Elements of Copyright Infringement:*

To establish a claim for copyright infringement, the plaintiff must prove:

**Ownership of a Valid Copyright:** The plaintiff must demonstrate that they own a valid copyright in the allegedly infringed work. Registration with the U.S. Copyright Office is considered prima facie evidence of validity.

**Copying of Protected Elements:** The defendant must have copied original elements of the copyrighted work. Copying may be established through direct evidence or inferred from access to the work and substantial similarity.

#### *Relevant Cases:*

**Feist Publications, Inc. v. Rural Telephone Service Co., 499 U.S. 340 (1991):** Defined the threshold of originality required for copyright protection.

1 Three Boys Music Corp. v. Bolton, 212 F.3d 477 (9th Cir. 2000): Addressed the  
2 “access and substantial similarity” test in establishing copying.  
3

### 4 **Copyright Law in the UK**

5  
6 The legal framework governing copyright in the United Kingdom is primarily set  
7 out in the Copyright, Designs and Patents Act 1988 (CDPA 1988). This legislation, along with  
8 subsequent amendments, protects original works of authorship and provides legal remedies  
9 against unauthorized use of such works.  
10

#### 11 *Automatic Protection:*

12 Copyright protection arises automatically upon the creation of an original work.  
13 There is no requirement for registration, as in some jurisdictions like the United States.  
14

#### 15 *International Protection*

16 The UK is a member of international treaties such as the Berne Convention and  
17 the WIPO Copyright Treaty, which provide reciprocal copyright protection across member  
18 countries. This means that works first created in the UK are protected in other countries that are  
19 members of these treaties, and vice versa.  
20

#### 21 *Relevant UK Case Law*

22 Designers Guild Ltd v Russell Williams (Textiles) Ltd (2000): Established the  
23 importance of substantial copying and originality in proving infringement.

24 Elanco Products Ltd v Mandops (Agrochemical Specialists) Ltd (1994):  
25 Addressed implied licenses and copyright disputes in the context of collaborative works.  
26

1 Football Dataco Ltd v Yahoo! UK Ltd (2012): Confirmed that original databases  
2 could qualify for copyright protection under the intellectual effort requirement.

3 International Laws:

4 EU Competition Law: Covers anti-competitive practices within European  
5 markets.  
6

7 UK Competition Act (1998): Addresses abuse of market dominance and anti-  
8 competitive agreements.  
9

### 10 **Conclusion**

11 The Copyright, Designs and Patents Act 1988 provides robust protection for  
12 authors and creators in the UK. Copyright law ensures that creative works are safeguarded from  
13 unauthorized use while allowing for limited exceptions to foster creativity and public interest.  
14 UK copyright owners also benefit from reciprocal protection in other countries through  
15 international treaties, providing a broad scope of legal recourse against infringement.  
16  
17

18 Plaintiff in Pro Per is a UK citizen, uneducated in, and unexposed to, U.S. district  
19 and federal legal systems and laws. The plaintiff does not plead ignorance, but is trying to  
20 rapidly respect, learn and adhere to all district and federal laws and requirements. The plaintiff  
21 respectfully asks the court to note the limitations and disadvantages, but also to make reasonable  
22 adjustments for the plaintiff's personal vulnerabilities, disabilities and learning difference. The  
23 Plaintiff will also ask the court to make reasonable time adjustments for postage from the UK to  
24 California.  
25  
26

1  
2 The Plaintiff cites both the Berne Convention and the WIPO Copyright Treaty.  
3 Article 5(2) of the Berne Convention explicitly states that enjoyment and exercise of copyright  
4 "shall not be subject to any formality," meaning registration is not required to gain protection.  
5  
6

7 Additionally, The Plaintiff has learnt that his work may still be required to be  
8 registered under US copyright. The Plaintiff has filed a 10-book unpublished copyright  
9 registration, citing 2025 as the completion of the last book as required by law. Bloodborg: The  
10 Harvest (of which this copyright case stands) is the second of these 10 books, written between  
11 2018 and 2019. The case number for this copyright registration document is: **1-14654214871**.  
12  
13

## 14 **CASE 2. Vicarious Copyright Infringement (17 U.S.C. § 501)**

15 Vicarious copyright infringement occurs when a party benefits financially from  
16 another's infringing activity and has the right or ability to supervise or control the infringing  
17 conduct. It does not require direct participation in the infringing act but arises from a relationship  
18 that enables the infringement.  
19  
20

### 21 *Legal Elements of Vicarious Copyright Infringement:*

22 Direct Infringement by a Third Party: There must be an underlying act of  
23 copyright infringement.  
24

25 Financial Benefit: The defendant must derive a direct financial benefit from the  
26 infringing activity.  
27  
28

1 Right and Ability to Supervise: The defendant must have had the authority to  
2 supervise or control the infringing activity but failed to prevent it.

3 **Relevant Cases:**

4 Metro-Goldwyn-Mayer Studios Inc. v. Grokster, Ltd., 545 U.S. 913 (2005):  
5 Addressed the concept of vicarious infringement in the context of peer-to-peer file-sharing.  
6

7 Fonovisa, Inc. v. Cherry Auction, Inc., 76 F.3d 259 (9th Cir. 1996): Clarified that  
8 financial benefit and the ability to control are critical elements of vicarious liability.  
9

10 **CASE 3. Unfair Competition (California Business & Professions Code §**  
11 **17200)**  
12

13 California's Unfair Competition Law (UCL) prohibits "any unlawful, unfair or  
14 fraudulent business act or practice." A violation of UCL can arise from:  
15

16 Unlawful Acts: Violations of other laws or regulations serve as the predicate for a  
17 UCL claim.  
18

19 Unfair Acts: Conduct that is unethical, oppressive, or injurious to consumers or  
20 competitors.  
21

22 Fraudulent Acts: Business practices likely to mislead or deceive the public.

23 Legal Elements of Unfair Competition:  
24

25 The defendant engaged in unlawful, unfair, or fraudulent business practices.  
26  
27  
28



1 The plaintiff suffered an economic or reputational injury as a result of the  
2 defendant's actions.

3 **Relevant Cases:**

4  
5  
6 Cel-Tech Communications, Inc. v. Los Angeles Cellular Telephone Co., 20 Cal.  
7 4th 163 (1999): Defined the "unfair" prong of the UCL for claims brought by competitors.

8 Kwikset Corp. v. Superior Court, 51 Cal. 4th 310 (2011): Clarified standing under  
9 the UCL requires economic or property loss.

10  
11  
12 **CASE 4. Intentional Infliction of Emotional Distress (IIED) (California Civil**  
13 **Code § 1708)**

14  
15 Under California Civil Code § 1708, an individual may bring a claim for  
16 intentional infliction of emotional distress (IIED) where the defendant's conduct is extreme,  
17 outrageous, and intended to cause severe emotional harm.

18  
19  
20 **Legal Elements of IIED:**

21  
22  
23 **Extreme and Outrageous Conduct:** The defendant's actions must go beyond all  
24 bounds of decency, tolerable in a civilized society.

25 **Intent or Reckless Disregard:** The defendant must have acted with the intent to  
26 cause emotional distress or with reckless disregard for the likelihood of causing distress.

1           Severe Emotional Distress: The plaintiff must have suffered significant and  
2 debilitating emotional harm.

3           Causation: A direct link between the defendant's conduct and the plaintiff's  
4 emotional distress must be established.  
5

6  
7           **Relevant Cases:**

8  
9           Christensen v. Superior Court, 54 Cal. 3d 868 (1991): Addressed the standards for  
10 "outrageous" conduct in IIED claims.  
11

12           Hughes v. Pair, 46 Cal. 4th 1035 (2009): Clarified that severe emotional distress  
13 requires suffering that is substantial, not trivial or transitory.  
14

15           **Conclusion**

16           These legal frameworks establish the statutory and common law foundations for  
17 Plaintiff's claims. They demonstrate that Plaintiff's causes of action are supported by well-  
18 established legal principles and case precedents. Plaintiff respectfully asserts that the facts  
19 alleged in the Complaint are sufficient to satisfy these legal standards and warrant relief.  
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28

1                   **Accommodations for Pro Se Litigants in U.S. Courts**

2                   Again, respectfully, Plaintiff in Pro Per is a UK citizen, uneducated in, and  
3 unexposed to, U.S. district and federal legal systems and laws. The plaintiff does not plead  
4 ignorance, but is trying to rapidly respect, learn and adhere to all district and federal laws and  
5 requirements. The plaintiff respectfully asks the court to note the limitations and disadvantages,  
6 but also to make reasonable adjustments for the plaintiff's personal vulnerabilities, disabilities  
7 (Complex PTSD and comorbid illnesses) and learning difference of dyslexia.  
8

9                   Plaintiff cites the Federal Court's Duty to Construe Pro Se Pleadings Liberally. In  
10 U.S. federal courts, pro se litigants are entitled to certain accommodations. Courts are required to  
11 construe pro se filings liberally to ensure fairness.  
12

13  
14                   **Key Case Law:**

15                   Haines v. Kerner, 404 U.S. 519 (1972): Established that pro se pleadings are held  
16 to "less stringent standards" than those drafted by attorneys.  
17

18                   Erickson v. Pardus, 551 U.S. 89 (2007): Reaffirmed the principle of liberal  
19 interpretation for pro se filings, emphasizing that courts must review filings in the most favorable  
20 light to the litigant.  
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**Reasonable Accommodations Under the ADA.**

The Plaintiff has limitations and disabilities that affect his ability to litigate effectively, these can be evidenced on request of the court if required. The Plaintiff asserts that under the Americans with Disabilities Act (ADA), and by extension shared laws, ethical and value standards, he may be entitled to reasonable accommodations but will endeavor to meet and respect all requirements of the court.

*Reasonable Adjustments:*

Extensions for filing deadlines.

Allowing non-standard forms of communication, such as email, for submitting documents.

Granting additional guidance or leniency in procedural matters.

Granting mediation and protection from bullying and aggressive legal strategies of the defendant to evade lawful processes, to complicate the cases and to build falsehoods, unfair court bundles and undo stress and burden on the Plaintiff.

1 **8. The Plaintiff's concerns.**

2  
3 The Plaintiff is particularly worried about the non-cooperation of Riot Games in  
4 pre-litigation discovery and their bad faith negotiations, and retaliations for the past three years.  
5 The Plaintiff believes that, without federal or state help and interventions, especially in the  
6 discovery process, he cannot gain a fair and proper trial, and he will continue to be faced with  
7 emotional harm and legal trickery to build technicalities to have the cases kicked out- which has  
8 already been threatened by the defendant's representatives at Greenberg Glusker in a 2021 letter-  
9 and to frustrate the cases to cause harm and stress.  
10  
11

12 It should be noted that after the success of Arcane- which is now leading the  
13 directions of all of Riot Games's universe canon lore and all of their future narrative storytelling  
14 in film, animation and TV- Riot Games shutdown the Riot forge publishing arm of their  
15 company (Where Bloodborg was submitted) and laid off 11% of their work force, of over 500  
16 people. A large percentage of these employees were working in narrative roles.  
17

18 The Plaintiff has had limited communication with some of these laid off former  
19 employees. Many are reluctant and scared to talk out against Riot Games. An undercurrent of  
20 fear of retaliation and of being sued due to oppressive NDAs can be evidenced.  
21

22 Moreover, The Plaintiff has concerns about a possible correlation between those  
23 11% who were laid off and employees who have spoken out about, or cooperated with  
24 investigators, regarding Riot Games's past crimes, discriminations and unethical behaviors and  
25 business practices.

26 The Plaintiff feels vulnerable but fears wider concerns at Riot Games.  
27  
28

JANUARY 15, 2025 *M. WOLSTENHOLME*

The Plaintiff, Marc Wolstenholme, M.W. Wolf.